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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDY GOFFMAN CUTLER,

Plaintiff,

- against -

ART LOSS REGISTER, INC. and
JACK SOLOMON,

Defendants.

07 CV 3807 (LAP)

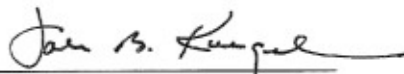
NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Amended Complaint filed in this action, the accompanying Memorandum of Law in Support of Defendant's Motion to Dismiss and declaration of Christopher A. Marinello, Esq., dated July 24, 2007, Defendant Art Loss Register, Inc. will move this Court, before Hon. Loretta A. Preska, United States District Judge, in Courtroom 1320 of the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, to dismiss Plaintiff's Amended Complaint with prejudice against this Defendant, and for such other and further relief in favor of this Defendant as the Court may deem just and proper.

The requested order of dismissal should issue because the single count pleaded against Defendant Art Loss Register fails to sufficiently allege all of the elements required to state a valid claim for prima facie tort upon which relief can be granted.

Dated: New York, New York
July 30, 2007

THE KOEGEL GROUP LLP



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